

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

In Re: Ethicon Inc., Pelvic Repair System Product Liability Litigation
MDL No. 2327

Civil Action No. 2:13-27218

SHANNON RANDOL,

Plaintiff,

vs.

ETHICON, INC., et al.

Defendants.

Case No. 2:13-cv-27218

**Motion To Withdraw As Counsel Of Record For Plaintiff Shannon Randol
And To Extend All Deadlines Sixty Days**

Pursuant to Local Rule 83.4, the undersigned counsel (“Counsel”) for Shannon Randol (“Plaintiff” or “Ms. Randol”) moves this Court for leave to withdraw as Plaintiff’s representatives and to extend all deadlines in Plaintiff’s case for sixty days. In support of this Motion, and for good cause shown, Counsel would state as follows:

1. Plaintiff Shannon Randol filed her Short Form Complaint on October 29, 2013 (ECF No. 1) against Defendants for products liability relating to injuries she sustained by Defendants’ transvaginal mesh products.
2. Plaintiff’s original deadlines to submit her Plaintiff Profile Form, signed verifications and authorizations and medical records have long since passed.
3. Plaintiff refuses to communicate with Counsel. Counsel has made scores of attempts to contact Plaintiff Randol dating back to December 2013. These attempts

include many letters, phone calls, and electronic attempts since 2013 to communicate with Ms. Randol by phone, U.S. Mail and email without response.

4. Plaintiff's counsel also used skip tracing databases to try and locate Ms. Randol, and thereafter sent several letters in 2014 to establish contact, along with additional phone calls. No response was received. In February 2018 and again in August 2018, counsel sent final letters to Ms. Randol notifying her the undersigned counsel would be forced to withdraw unless she contacted counsel. On August 31, 2018, the United States Post office returned to us two Priority Mail letters sent to two separate addresses for Ms. Randol, and the Post Office states, "Return To Sender, Unable to Forward."

5. Counsel has retained copies of these letters, certified mail receipts, and images of the most recent Priority Mail envelopes confirming delivery failure. Counsel will provide copies of these communications and correspondence efforts to Ms. Randol for *in camera* review upon the Court's request.

6. Plaintiff's refusal to cooperate in the prosecution of her case—and her failure to respond to numerous written, telephonic, and electronic database inquiries by her counsel—makes Counsel's continued representation impossible.

7. Counsel respectfully requests the Court permit the undersigned Counsel to withdraw from Ms. Randol's representation, and thereafter extend deadlines in Plaintiff's case by sixty days to allow Plaintiff time to retain additional counsel, if she chooses to do so.

Dated this 10th day of September 2018.

Respectfully submitted,

/s/ Chris W. Cantrell

Chris W. Cantrell, Esq.

DOYLE LOWTHER LLP
William J. Doyle II

John A. Lowther
Christopher W. Cantrell
4400 NW 77th Street, Suite 275
Vancouver, WA 98662
(360) 818-9320 phone
(360) 450-3116 fax
bill@doylelowther.com
john@doylelowther.com
ccantrell@doylelowther.com

Certificate Of Service

I hereby certify on this 10th day of September 2018 I electronically filed the foregoing document with the Court using CM/ECF. I also certify the foregoing document is being served on this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or by other means.

/s/ Chris W. Cantrell

Chris W. Cantrell, Esq.